## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§		
WATTSTOCK, LLC,	§ § §	Case No.	21-31488-sgj11V Ch. 11
Debtor.	\$ §		
	§		
WATTSTOCK, LLC,	§		
Plaintiff,	§	Adv. No.	21-03083-sgj <sup>1</sup>
	§		
V.	§		
	§	Civil Case No	3:21-cv-03183-bs
ALTA POWER LLC,	§	CIVII Cuse I vo.	3.21 CV 03103 05
•			
Defendant, Counter-Plaintiff, and	§		
Third-Party Plaintiff,	§		
	§		
V.	§		
	§		
WATTSTOCK, LLC,	§		
Counter-Defendant, and	§		
Country Borondam, and	§		
GENERAL ELECTRIC INTERNATIONAL, INC.,	8 8		
d/b/a GE POWER SERVICES,	§		
,			
Third-Party Defendant.	§		

# NOTICE OF APPEARANCE OF JOHN T. COX III, ANDREW LEGRAND, POOJA PATEL, AND ERIC HAITZ

PLEASE TAKE NOTICE that Third-Party Defendant General Electric International, Inc. ("GEII") hereby provides notice that attorneys John T. Cox III, Andrew LeGrand, Pooja Patel, and Eric T. Haitz are appearing as its counsel of record in this case. GEII respectfully requests that copies of all pleadings, orders, notices, and other papers filed in this action be provided as follows:

John T. Cox III Andrew LeGrand Pooja Patel

### GIBSON, DUNN & CRUTCHER LLP

2001 Ross Avenue, Suite 2100 Dallas, TX 75201

Removed from the District Court of Dallas County, Texas, 116th Judicial District, Cause No. DC-20-08331.

Tel: 214.698.3100

Email: TCox@gibsondunn.com ALegrand@gibsondunn.com

PPatel@gibsondunn.com

Eric T. Haitz

GIBSON, DUNN & CRUTCHER LLP

811 Main Street, Suite 3000 Houston, TX 77002-6117

Tel: 346.718.6600

Email: EHaitz@gibsondunn.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the

notices and papers referred to in the Bankruptcy Rules specified above but also includes, without

limitation, any notice, application, complaint, demand, motion, petition, pleading, or request,

whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

telephone, telegraph, telex, or otherwise filed or given with regard to the above-referenced

Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed as (a)

a consent by GEII to the jurisdiction of this Court or any other court with respect to this Adversary

Proceeding; or (b) a waiver of any right of GEII (i) to trial by jury in any proceeding so triable

herein or in any case, controversy, or proceeding related hereto, or (ii) to other rights, claims,

actions, defenses, setoffs, or recoupments to which GEII is or may be entitled under agreements,

in law, or in equity, all of which rights, claims, actions, defenses, and setoffs are hereby expressly

reserved.

[remainder of page blank]

2

Dated: January 20, 2022 Respectfully submitted,

#### GIBSON, DUNN & CRUTCHER LLP

/s/ John T. Cox III

John T. Cox III (Tex. Bar No. 24003722) Andrew LeGrand (Tex. Bar No. 24070132) Pooja Patel (Tex. Bar No. 24104064) 2001 Ross Avenue, Suite 2100, Dallas, TX 75201

Tel: 214.698.3100

Email: TCox@gibsondunn.com ALegrand@gibsondunn.com PPatel@gibsondunn.com

and

Eric T. Haitz (Texas Bar No. 24101851) 811 Main Street, Suite 3000 Houston, TX 77002-6117

Tel: 346.718.6600

Email: EHaitz@gibsondunn.com

Counsel to General Electric International, Inc.

## **CERTIFICATE OF SERVICE**

I certify that on January 20, 2022, a true and correct copy of the foregoing document was served on all counsel of record through the Court's ECF system.

/s/ Eric T. Haitz

Eric T. Haitz